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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AUTOMOTIVE TECHNOLOGIES : CASE NO.: 2:11-cv-02490(SRC)(MAS)
INTERNATIONAL, INC. : Hon. Stanley R. Chesler
:
Plaintiff, :
-vs.- : **NOTICE OF MOTION TO AMEND
COMPLAINT**
:
ONSTAR GLOBAL SERVICES :
CORPORATION, : Return Date: August 15, 2011
:
Defendants. :

TO: Michael E. Patunas
Mayra V. Tarantino
Lite Depalma Greenberg, LLC
Two Gateway Center, 12th Floor
Newark, New Jersey 07101

Mark M. Supko
Jeffrey D. Ahdoot
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1001 Pennsylvania Ave, NW
Washington, DC 20004

Please take notice that on June 15th, 2010, or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff will move before the Honorable Stanley R. Chesler, U.S.D.J., at the United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building, Room 5054, 50 Walnut Street, Newark, New Jersey for an order to allow plaintiff to amend its complaint to substitute OnStar, LLC for Onstar Global Services Corporation as the defendant in this matter.

Using the best information at the time of filing, plaintiff believed OnStar Global Services to be the proper defendant. Since the date of filing, it has come to plaintiff's attention that OnStar, LLC is the proper defendant to whom the complaint should be addressed. The plaintiff therefore requests to amend the brief to include OnStar, LLC as a defendant party pursuant to Fed.R.Civ.Pro. 15(a)(2), because twenty-one days have passed since the date of service for the first defendant.

In support of this application, plaintiff relies on a Certification of Counsel submitted herewith. Pursuant to Local Civil Rule 7.1(d)(4), no brief has been submitted in support of this motion. Plaintiff believes a brief is not necessary for this application because this application has been brought at the effective inception of this case, this application has been filed only because the plaintiff falls outside the 21-day time period set forth in Fed.R.Civ.Pro.15(a)(1)(B) by four days, and Fed.R.Civ.Pro.

15(a)(2) states that “[t]he court should freely give leave when justice so requires” with regard to requests to amend pleadings.

Please take further notice that a proposed form of Order is also submitted herewith.

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By: /s/ Philip Rosenbach
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July 15, 2011

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